UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON

STEVEN M. WILLIAMS,)
Plaintiff,))
v. BOB BARKER INCORPORATED, AUDIE MURPHY, LT. DAVID CAVENDISH, AND TIMOTHY PERKINS,	Civil Action No.: 2:21-cv-00436 Judge: John T. Copenhaver
Defendants.	,))

DEFENDANT BOB BARKER COMPANY, INC.'S MOTION TO DISMISS

COMES NOW Defendant Bob Barker Company, Inc. ("Defendant"), by and through its counsel, Clark Hill PLC, pursuant to Rule 12(b)(6) of the *Federal Rules of Civil Procedure*, and hereby moves this Court for dismissal of Plaintiff's claims against it in their entirety

WHEREFORE, as more fully discussed in the Memorandum of Law filed contemporaneously herewith, Defendant respectfully requests that this Court dismiss Plaintiff's claims against with prejudice, and award it any other such relief as the Court deems appropriate.

[signature page to follow]

Respectfully submitted,

CLARK HILL PLC

Date: November 4, 2021

By: /s/ Allen M. Lopus

Allen M. Lopus, Esq. WV I.D. No. 7653 Vincent M. Roskovensky, Esq. WV I.D. No. 10160 Mario R. Bordogna, Esq. WV I.D. No. 9491 Brandon J. Verdream, Esq. WV I.D. No. 11200

Firm I.D. No. 282
One Oxford Centre
301 Grant Street, 14th Floor
Pittsburgh, PA 15219-1425
(412) 394-7711
(412) 394-2555 (fax)
alopus@clarkhill.com
vroskovensky@clarkhill.com
mbordogna@clarkhill.com
bverdream@clarkhill.com

Attorneys for Defendant, Bob Barker Company, Inc.

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON

STEVEN M. WILLIAMS,)
Plaintiff,))
v. BOB BARKER INCORPORATED, AUDIE MURPHY, LT. DAVID CAVENDISH, AND TIMOTHY PERKINS,	Civil Action No.: 2:21-cv-00436 Judge: John T. Copenhaver
Defendants.)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion to Dismiss has been served upon counsel of record this 4th day of November, 2021, as follows:

VIA U.S. MAIL

Steven Williams #3545024
Mt. Olive Correctional Complex
1 Mountainside Way
Mt. Olive, WV 25185
Pro Se Plaintiff

VIA COURT'S CM/ECF SERVICE

Michael D. Mullins, Esq. Colson C. Parsons, Esq.

STEPTOE & JOHNSON PLLC

P.O. Box 1588 Charleston, WV 25326-1588

Telephone: (304) 353-8000 Facsimile: (304) 353-8180

 $\frac{michael.mullins@steptoe-johnson.com}{colton.parsons@steptoe-johnson.com}$

Of Counsel

By: /s/ Allen M. Lopus
Allen M. Lopus, Esq.
WV I.D. No. 7653